



October 18, 2019

Marlene H. Dortch, Secretary

Federal Communications Commission

445 12th Street, S.W., Room TW-B204

Washington, DC 20554

Re: Reply to Comments of the National Rural Electric Cooperative Association in the Matter  
of Rural Digital Opportunity Fund (WC Docket No. 19-126) and Connect America Fund  
(WC Docket No. 10-90)

Madame Secretary,

This letter is in reference to comments submitted by the National Rural Electric Cooperative Association on September 20, 2019, which closely affirms the position of FiberRise regarding the Rural Digital Opportunity Fund WC Docket Numbers 19-126 and 10-90.

FiberRise currently serves electric cooperatives in Tennessee, Alabama, Mississippi, Georgia, South Carolina, North Carolina, and Kentucky. By partnering with FiberRise, electric cooperatives benefit through grid modernization projects as well as installation and operation of fiber infrastructure. FiberRise delivers a complete project and business visibility solution set that simplifies the delivery of high-quality and high-speed broadband services to cooperative members. FiberRise provides our cooperative partners with the service and support needed to



manage fiber broadband projects from feasibility study to everyday operation. By helping to make broadband affordable and accessible to all, FiberRise continues to improve the quality of life for rural America.

With respect to the NRECA's executive summary statements, FiberRise concurs with suggestions to:

- Adopt a limited challenge process in price cap areas:
  - FiberRise believes that when real-time service data gathered by electric cooperatives in relation to competitive broadband offerings available to their membership contradicts legacy FCC Form 477 data, the serving cooperative should be able to provide RDOF-eligible service to applicable census blocks.
  - Traditional telecommunications carriers have received billions of dollars in funding to provide next-generation broadband services for rural communities. However, their legacy business models have failed to provide adequate coverage at usable and reliable broadband rates, which has—in some cases—robbed these rural communities of the necessary tools to compete in global economies, provide higher education and distance learning opportunities, and transition to next-generation healthcare models where they are desperately needed.
  - Electric cooperatives have many decades of experience designing, building, and operating critical infrastructure networks for the express benefit of their rural memberships. Most importantly, Electric cooperatives are non-profit entities that provide key services to their members without the need to

generate corporate profits. In short, electric cooperatives are the most efficient and effective vehicle for delivering a reliable, high-performance broadband network to rural America.

- The sole purpose of FiberRise is to help electric cooperatives design, install, and operate resilient, high-capacity community broadband networks. And these fiber networks are fast becoming the twenty-first century backbone of America's economy – empowering rural residents, schools, healthcare, and businesses to thrive on a global scale.
- Expansion of performance tiers and weighting:
  - FiberRise strongly agrees with the NRECA and other commenters who support provision of incentives to providers who offer higher levels of service (e.g., 100 mbps upstream/100 mbps downstream and higher) and lower latency performance, i.e., less than or equal to 50 ms. High rate symmetrical broadband service is critical to supporting current and future healthcare, education, and economic growth programs that will require significant upstream data capacities.
  - Further, FiberRise believes allowing the broadband “bar” to remain at 25/3 Mbps only ensures the FCC will spend \$20.4 billion to fund rural broadband networks that will be woefully obsolete before the RDOF program is completed.
  - Although recent advances in satellite technology have improved subscriber bandwidth delivery to some degree, most satellite networks still suffer from

the efficiency roadblock of high latency. This is certainly true when compared to fiber optic broadband networks. As well as facing latency and other performance delivery challenges, satellite networks are grossly expensive. For example, SpaceX's planned "Starlink" constellation of low-Earth orbit satellites cost estimates would appear to consume a sizeable portion of the entire proposed RDOF funding.<sup>1</sup> And that's just to get the hardware into orbit, with no customer premise equipment or operational costs factored in.

- Relaxation of the 70% subscription obligation:
  - o Although FiberRise's electric cooperative partners have achieved significant take rates for their fiber broadband service offerings, it is not possible to positively guarantee a particular subscription rate. With that said, the more rural the area, the more likely competitively priced electric cooperative fiber broadband services will be seen by members as delivering the most value for their subscription dollars.

In summary, FiberRise agrees with the National Rural Electric Cooperative Association that non-profit electric cooperatives can effectively deliver the benefits of higher bandwidth broadband networks today and do so in the most cost-effective manner to benefit rural subscribers.

It should also be noted that these fiber-based broadband networks, capable of delivering more than 1 Gbps of symmetrical service per subscriber, will also virtually future-

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<sup>1</sup> Samantha Masunaga, "Cost Could Be SpaceX's Biggest Barrier to Satellite Internet," Los Angeles Times, July 1, 2019.



proof electric cooperative networks and, as previously highlighted, will offer immediate as well as far-reaching enhancements to community health, education, industry, and smart grid applications.

We believe NRECA members offer the Commission the very best outlook for RDOF funding:

- Built-in expertise
- Nearly a century of critical infrastructure construction and operation
- An embedded membership of subscribers who already enjoy a trusted relationship with their local electric cooperative

FiberRise commits to working with the Commission and NRECA cooperatives to cost-effectively build and operate the broadband networks of the future.

Respectfully submitted,

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